

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ATLAS DATA PRIVACY CORPORATION, *as assignee of individuals who are Covered Persons*,
JANE DOE-1, *a law enforcement officer*, JANE
DOE-2, *a law enforcement officer*, PATRICK
COLLIGAN, and PETER ANDREYEV,

Plaintiffs,

v.

GREENFLIGHT VENTURE CORP., RICHARD
ROES 1-10, *fictitious names of unknown*
individuals and ABC COMPANIES 1-10, *fictitious*
names of unknown entities,

Defendants.

Case No.: 25-cv-1517-HB

CIVIL ACTION

**DEFENDANT GREENFLIGHT VENTURE
CORP.'S NOTICE OF MOTION TO
DISMISS PLAINTIFFS' COMPLAINT,
PURSUANT TO FED. R. CIV. P. 12(b)(2)**

Motion Returnable: April 22, 2025

Oral Argument is Requested

**NOTICE OF MOTION BY DEFENDANT GREENFLIGHT VENTURE CORP. TO
JOIN CONSOLIDATED MOTION TO DISMISS PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 12(b)(2)**

TO: Clerk of the Court
United States District Court, District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

AND TO: Counsel of Record (via ECF)

PLEASE TAKE NOTICE that on April 22, 2025, or as soon thereafter as counsel may be heard, Defendant Greenflight Venture Corp. (hereinafter "Greenflight"), by and through undersigned counsel, will respectfully move before the Honorable Harvey Bartle III, U.S.D.J., at the United States

District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey 08101, for an Order dismissing Plaintiffs' Complaint for lack of personal jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2).

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d), this Notice is timely filed and served to join the existing Consolidated Motion to Dismiss for Lack of Personal Jurisdiction (hereinafter "Consolidated Motion") previously filed by co-defendants on March 18, 2025, returnable April 22, 2025, in the related action *Atlas Data Privacy Corp., et al. v. GoHunt LLC, et al.*, Case No. 1:24-cv-04380-HB. Greenflight seeks explicitly to join and fully incorporates by reference all arguments, authorities, and factual submissions made therein. This notice does not constitute a waiver of the right to dismiss this case for failure to state a claim, pursuant to the Court's previous order staying this case.

In further support of its joinder and the relief requested, Greenflight submits concurrently:

1. Supplemental Memorandum of Law addressing jurisdictional facts specific to Greenflight;
2. Affidavit of Jeffrey Isaacs, Chief Executive Officer of Greenflight, setting forth facts demonstrating Greenflight's complete lack of contacts with New Jersey.

Dated: March 24, 2025

Respectfully submitted,
Law Offices of Jared M. Wichnovitz, P.C.
Attorneys for Defendant, Greenflight Venture Corp.

/s/ Jared M. Wichnovitz

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